



**Valles Caldera National Preserve
Interim Grazing Strategy
Supplement to the Environmental
Assessment**

NEPA Adequacy Review

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I. Introduction

The purpose of this supplement is to document the Valles Caldera Trust's compliance with the National Environmental Policy Act (NEPA) and the NEPA procedures of the Trust in the management of the Interim Grazing Program.

The Interim Grazing Program has been operating under an implementing decision based on an Environmental Assessment completed in August of 2002 and amended in March of 2003. The documents were incorporated into a Stewardship Register in January of 2004.

This supplement documents a review of the Environmental Assessment as amended to determine its adequacy to continue management of an interim (limited in location and duration) program. Based on the process used by the Department of Interior, six criteria were evaluated in determining the adequacy of the current analysis:

- (1) Proposed Action
- (2) Range of alternatives
- (3) New information
- (4) Method and analytical approach of the analysis
- (5) Analysis of direct, indirect, and cumulative effects; and the Finding of No Significance.
- (6) Public involvement

The Valles Caldera Trust is committed to the use of adaptive management. Adaptive management as defined in the NEPA procedures of the Trust means adjusting stewardship actions or strategic guidance based on knowledge gained from new information, experience, experimentation, and monitoring results and is the preferred method for managing complex natural systems.

II. Documentation of NEPA Adequacy

- (1) Is the current proposed action substantially the same action (or is part of that action) as previously analyzed? Is the current proposed action located at a site specifically analyzed in an existing document?*

Yes

- (2) Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests and resource values?*

Yes – Alternatives were developed to address three issues:

- Water quality and aquatic habitat
- Elk cattle forage use and behavior
- Socio-cultural

The alternatives considered in the current EA adequately addressed the key issues and meet the purpose and need as stated for the interim grazing program.

(3) Is the existing analysis valid in light of any new information or circumstances?

Yes – the Trust has been able to compile sets of data on the effects of livestock interaction on vegetation; water quality, riparian function, as well as specific information on cattle behavior and cattle and elk interactions. None of this data refutes the assumptions and conclusions made in the current EA as amended. The Trust also has the latitude to adjust the program as new data or data that is more refined becomes available.

(4) Do the methods and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?

Yes- the methods and analytical approach used in the current EA as amended were consistent with standard approaches used by the U.S. Forest Service and Bureau of Land Management.

(5) Are the analysis of direct, indirect, and cumulative effects and the finding of significance valid based on current information?

Yes

(6) Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Yes, in addition to the initial analysis, the Trust notified the public through letters, web postings, and public meetings of the intent to determine the adequacy of the current analysis and continue the interim grazing program for one or more seasons as necessary to allow the development of a comprehensive plan for the management of forage on the preserve.

III. Monitoring and Evaluation

Based on rangeland monitoring program data from 2001-2005, the condition of the Preserve's rangeland resources have not been negatively affected by the current interim livestock grazing program. The allocation of forage for livestock has allowed the total utilization to remain below 40% on average. Experimental exclosure studies will continue in the Preserve's riparian zones to assess long-term impacts of elk and livestock

on both terrestrial and aquatic resources. Rangeland forage production and utilization also will be monitored under the extended Environmental Assessment to ensure compliance with all natural resource requirements.

IV. Adaptive Management Recommendations

For the extension period of the Preserve's interim grazing program, the following recommendations and justifications should be considered:

1. Livestock stocking levels during 2002-2005 were sufficiently low so as to prevent detectable impacts on rangeland resources. As a prelude to developing a long-term grazing plan for the Preserve, a higher stocking rate in 2006 (but within the existing EA's 2000 Animal Units limit) is recommended to determine the upper level at which livestock can be supported and still result in no significant damage to natural resources.
2. The Preserve's riparian areas appear to be utilized at a level that is close to the maximum permitted under the existing E.A.; as such, if higher stocking rates are attempted, additional attention to riparian protection should be undertaken. Such methods may include fencing off riparian zones with wire or electric fences, or more range rider effort to direct livestock away from riparian zones. Continued monitoring of riparian zones is essential to evaluate the results of any or all of these actions.
3. In the interest of investigating the ecological and economic impacts of different herd types, the inclusion of a steer operation should be considered.

V. Determination of adequacy

I have reviewed the Environmental Assessment for an Interim Grazing Strategy on the Valles Caldera National Preserve, as amended in March, 2003. Based on the six criteria in Section II, the monitoring and evaluation information and adaptive management recommendations, it is my determination that the current Environmental Assessment as amended is adequate for the continuation of an interim grazing strategy.

/s/Dennis Trujillo

Dennis Trujillo
Preserve Manager

December 14, 2005

Date